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February 13, 2015

Bill Gamble
Wallowa-Whitman National Forest
3502 Highway 30
LaGrande, OR 97850

Email: bgamble@fs.fed.us

RE: East Face Vegetation Management Project – Proposed Action Scoping

Dear Bill:

This letter is submitted in response to the US Forest Service request for comments on the East Face Vegetation Management Project – Proposed Action Scoping (East Face PA), which seeks to enhance forest & rangeland resiliency throughout the 47,621-acre East Face planning area through a combination of commercial timber harvest, non-commercial thinning, forest roading, prescribed burning, and other management activities.

I am writing on behalf of Associated Oregon Loggers, Inc. (AOL), which represents more than 1,000 logging and allied forest member companies. These companies play a major role in management of private & public forests throughout Oregon— as contractors, purchasers and vendors of forest management services (operators). AOL member companies commonly sub-contract or purchase Forest Service forestry and roading contracts. AOL operators depend on a reliable quantity of timber supply and forest management project acreage, including federal forests. We encourage national forest projects that promote active management of Oregon's federal forests through sawlog harvest— especially via the restoration of overcrowded and unhealthy forests. As such, AOL represents substantial expertise in forest management. AOL members are directly impacted by the decisions that will be made as a result of national forest projects, such as the proposed East Face DEIS.

We appreciate the opportunity to comment, and are writing to urge you to proceed promptly with project planning, while addressing our suggestions for improving project viability and landscape outcomes due to implementation. Please consider the following recommendations for honing the project purpose & need, developing alternatives, and choosing a proposed action:

Larger size & scope of project area is correct. This larger-than-ordinary landscape scale approach provides for better scale economies, as well as the ability to efficiently meet stated objectives. Your proposed treatment of at least 35% of the planning area acres provides a good basis to begin addressing the project Purpose & Need. However, to provide reasonable scale economies, in the following pages we'll urge commercial timber harvest treatment of more than the proposed 14% of area acres. With suggested modifications, this large-scale project could conduct the urgently-needed forest health improvements, contribute sawlogs to the economy, reduce threats to neighboring private property, improve forest roads and watersheds, enhance habitat, dampen fire hazards, thin over-stocking, curb disease & pests, and expand future management opportunities.

Purpose & Need for Action modified. The stated ‘Purpose & Need’ could be enhanced by several modifications suggested that would better facilitate accomplishment of the desired future forest conditions. Clarification to articulate a comprehensive project Purpose is seminal to guide project planning and cost-effective implementation. The following additions would improve the Purpose:

- A. ADD another Purpose bullet -- ***Improve and maintain forest access roads necessary for long-term land management, resource protection, recreation, agency administration (including emergency access), and project implementation.***
- B. ADD another Purpose bullet -- ***To implement an economically-efficient project that optimizes positive timber value that can support non-commercial resource improvements.***
- C. EDIT 2nd Purpose bullet -- ***To enhance landscape resilience to future wildfire, insect and disease risk, and capitalize on the opportunity to apply cohesive wildfire strategy principles across all landownerships. Reduce potential for large national forest-originated wildfires that could impact neighboring private lands.***
- D. EDIT 4th Purpose bullet -- ***To enhance the diversity and quality of habitat conditions across the planning area to help reduce ungulate impacts on neighboring private agricultural lands and improve overall diversity and distribution of wildlife habitat.***

Preliminary Issues modified. The stated ‘Resource and Management Concerns’ could be enhanced by several modifications suggested that would better facilitate accomplishment of the desired future forest conditions. We believe that the East Face Proposed Action and subsequent project alternative development would be strengthened by the agency addressing additional key issues—issues not currently stated as “Preliminary Issues” in the scoping document (Jan. 15, 2015). The following issues are very important to the forest sector and the neighboring non-federal landowners:

- 1. ADD another issue: ***Border Forests – National forest lands within 1.5 miles of neighboring private or non-federal property, and WUI areas, need to be managed to reduce potential for large national forest-originated wildfires that could impact those neighbors.***
- 2. ADD another issue: ***Forest Access – The road system is in disrepair, in-places impacting resource values, and in other places insufficient to accomplish long-term land management, resource protection, recreation, neighboring property protection, agency administration (including emergency access), and project implementation.***
- 3. ADD another issue: ***Timber Yield – Sawtimber harvest volumes from the Blue Mountains national forests are well below the quantities necessary to sustain the existing forest sector infrastructure in the Blue Mountains working circle (refer to the attached report, by AOL and AFRC, dated August 1, 2014). Therefore, significant sawlog timber harvest from this project is essential to maintain this local forest sector infrastructure.***

4. EDIT Issue #3, *Economics – Efforts to balance between economic and resource value tradeoffs will be necessary. Alternatives considered that would achieve greater economic values and lesser ecological values. The area includes many low value trees and in-places costly logging/road systems, which can make it difficult for the value of the product removed to support the operating costs, resulting in a potential deficit sale. Options should explore optimizing the following: increased sawlog harvest volume/acre; higher sawlog to fiber ratio on an acre; more project sawlog volume % to less fiber volume %; more project acres of commercial treatment vs. less non-commercial treatment [alter non-commercial Rx to accomplish commercial]; additional road access for long-term management; more cable rather than helicopter; mechanized falling maximized.*

Economic feasibility is essential. Economic factors are critical to accomplish a viable forest management project, as well as to accomplish a host of resource enhancement or restoration activities. Prescriptions and project plans should optimize economic value of the timber harvested. Stated another way, the residual value of the timber volume must be positive (the log pond value less the total costs of operating/harvest and project improvements/allied activities).

For example, the economic means to help pay for the non-merchantable thinning (or other enhancement tasks) is derived from optimizing the sawtimber harvest of merchantable trees. Such optimizing of value harvested should involve the following: cutting some trees over 21” dbh; elevating volume per acre removed; a practical forest road network to optimize access to managed portions of the landscape; designation by description/purchaser select (reduced marking cost/improved residual stands); implemented treatments fully harvest the planned NEPA timber removal; created openings/gaps that bolster economic harvest; each acre treated optimizes harvest value; harvest of imminent tree mortality surplus to snag/large tree needs—regardless of size; harvest of high hazard pest & disease trees surplus to snag/large tree needs—regardless of size; and optional removal of unmerchantable material from the sale area. Without cost-effective sawlog revenue included, the non-commercial treatments become infeasible.

Forest Plan Amendments and 21” diameter limit. We agree that the proposed forest plan amendments are essential for the project to be feasible, to meet purpose & need, as well as to accomplish all the desired resource objectives.

The agency should consider a forest plan amendment to harvest trees over 21” dbh, of any species, as a necessary component to implement the desired future conditions sought by this project. Harvesting a portion of these plus-21 trees is absolutely necessary to reduce unacceptable risks of future landscape-scale forest losses to catastrophic fire, pests, disease, and storms. We strongly support your efforts to commercially thin trees to restore forest resiliency while moving the project area toward the historic range of variability, to sustain riparian areas, and to reduce disease problems. The desired future conditions stated in the 1990 Wallowa-Whitman Forest Plan necessitate that those desired conditions cannot be accomplished without harvesting some plus-21 trees, of any species.

Please consider allowing some large trees to be removed, subject to the Silviculturist’s professional discretion and written prescription. There are trees of all species that would be subject to imminent mortality, and warrant removal to achieve the prescriptive and desired future condition objectives.

Please consider an alternative allowing practical Silviculturist prescription that would facilitate removing some large trees—so as to accomplish forest health and fire reduction objectives.

Avoid limiting the options for “connected actions” language. The proposed harvest and road treatments necessarily must include a full range of “connected actions.” NEPA language should not become self-limiting—in other words, authorized connected actions should be defined in broad terms using objectives that would not prohibit a specific necessary activity (which had failed to make a prescriptive self-limiting list). Broad categories might include a full-suite of available tools, such as: worker and public safety authorized during operations, reforestation, young tree release/improvement, fuels treatment, pest & disease control, invasive control, road maintenance, fire prevention, prescribed fire, and hazard removal.

Avoid prescriptive logging/operational methods language. Timber should be harvested using appropriately-prescribed ground-based, cable, or helicopter logging methods. I’d urge you to design sufficient logging/transportation plans that would facilitate nearly all logging by ground-based or cable systems. Planned construction of roads (temporary or other) to facilitate harvesting sites by ground-based or cable logging would be the most economical and environmentally rationale (rather than helicopter yarding low volumes/acre). Helicopter yarding feasibility demands higher value/volume per acre—which is more typical of regeneration harvest methods. It is unreasonable to dictate harvesting the low volume/acre proposed from thinning. “Skyline” is needlessly too prescriptive for NEPA language—considering the array of cable-based methods that could yield desirable yarding results. Furthermore, the NEPA decision document language should accommodate a full range of modern harvest technologies; rather than needlessly prescribing one specifically-limiting system or method. Express harvest objectives as outcomes, rather than prescriptive equipment requirements. For example, whole-tree logging, shovel logging, grapple skidding, and feller-bunchers should be viable methods, subject to the professional discretion of the timber sale officer, logging contractor, and timber purchaser—considering real-time, on-site conditions. Mechanical timber falling and fuel treatments using mechanical methods—such as shovels, grapple machines, feller-bunchers & processors—should be allowable on cable or helicopter yarded units. The NEPA decision must not limit these prescriptive sorts of operational decisions before the contract is offered.

Support harvest of large areas across the landscape. We strongly support the proposed 25,000 acres thinning and mechanical fuel treatments. This harvest is necessary to promote desired future sustainable and resilient forest conditions, including: resilience to fire-pests-disease-storm disturbances; large tree structures; understory plant diversity; forage productivity; spatial heterogeneity; increased early seral tree species & habitat; and forested recreation in healthy and safe forestlands accessible by roads.

Support harvest of some riparian areas to improve conditions. Restoration of some select riparian areas (Cat. 4 RHCA) would protect and restore watershed function. Riparian and flood plain restoration could include road reconstruction, road closure after use, channel/bank modification, fencing, planting, conifer thinning/harvest, and instream placement.

Support road construction and improvements to enhance forest uses. The transportation system should be improved and expanded by this project to facilitate future road management to achieve an array of objectives—not limited to those stated in the Wallowa-Whitman Forest Plan— including: forested recreation in a healthy and safe atmosphere, firefighting, forest fire protection of boundary forests neighboring private lands, tribal and cultural uses, habitat improvement, timber harvest, forest vegetation treatments, fire prevention & suppression, rangeland & forage management, agency administration, forest worker safety, and public safety during road travel. We support forest road system improvements greater than those items in the Proposed Action, and additionally urge including further road reconstruction, road construction, managing both open & closed roads; and a “roads analysis” that would fairly balance the socio-economic and resource objectives.

Support adjustment of near-term scenic objectives to enhance long-term aesthetics. We strongly support the proposed Forest Plan Amendment in some areas where restoration activities would accomplish improved long-term scenic quality—after the proposed short-term disturbances (that do not meet stated visual quality objectives) have readily healed.

Support project developed with much local agreement. We strongly support the proposed project, which is being vetted by local community groups, including the Wallowa-Whitman Forest Collaborative.

Thank you for the opportunity to comment about the East Face Vegetation Management Project. If our comments create questions, please do not hesitate to contact me: 503-364-1330, or by email: rexstorm@oregonloggers.org

Sincerely,
/s/ Rex D. Storm
Rex Storm, CF
Forest Policy Manager,
Associated Oregon Loggers, Inc.